

Message Text

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PAGE 01 STATE 081112
ORIGIN TRSE-00

INFO OCT-01 NEA-10 ISO-00 EB-08 L-03 /022 R

DRAFTED BY TREAS:OS:SHANNES:LG
APPROVED BY EB/IFD/OMA:WMILAM
TREAS: OS:HDROSENBLUM
NEA/ARP:DWINN

-----032261 300155Z /14

P 292324Z MAR 78
FM SECSTATE WASHDC
TO AMEMBASSY ABU DHABI PRIORITY

UNCLAS STATE 081112

E.O. 11652: N/A

TAGS: EFIN

SUBJECT: ARAB MONETARY FUND
REF: ABU DHABI 0581

THIS IS IN REGARD TO YOUR PREVIOUS INQUIRY CONCERNING
THE STATUS OF THE ARAB MONETARY FUND. THE INTERNAL REVENUE
SERVICE HAS CONCLUDED THAT THE ARAB MONETARY FUND DOES NOT
QUALIFY FOR EXEMPTION FROM U.S. INCOME TAXES UNDER SECTION
892 OF THE CODE AS EITHER A FOREIGN GOVERNMENT OR AN INTER-
NATIONAL ORGANIZATION WITHIN THE MEANING OF SECTION 892.
THE FUND IS NOT AN INTERNATIONAL ORGANIZATION FOR SECTION
892 PURPOSES BECAUSE THE U.S. IS NOT A MEMBER OF THE FUND.
THE FUND DOES NOT QUALIFY AS A GOVERNMENT FOR SECTION 892
PURPOSES BECAUSE IT DOES NOT HAVE SUFFICIENTLY BROAD AND
INDEPENDENT GOVERNMENTAL POWERS BINDING ON THE EXTERNAL AND
DOMESTIC AFFAIRS OF ITS MEMBER COUNTRIES. AN IRS LETTER
RULING WILL BE ISSUED TO THE FUND WHICH HOLDS THAT THE 30
WITHHOLDING TAX IMPOSED UNDER SECTIONS 1441 AND 1442 IS TO
BE APPLIED TO THE FUND'S U.S. SOURCE INCOME. COOPER

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PAGE 01 STATE 081112
ORIGIN NEA-10

INFO OCT-01 ISO-00 SIG-03 MMO-04 AF-10 /028 R

66011

DRAFTED BY NEA/RA:ROPRICKETT:YW

APPROVED BY NEA/RA:SEPALMER, JR.

-----071628 010458Z /21

R 312100Z MAR 78

FM SECSTATE WASHDC

INFO ALL NEAR EASTERN AND SOUTH ASIAN DIPLOMATIC POSTS

AMEMBASSY KHARTOUM

AMEMBASSY NOUAKCHOTT

XMT AMEMBASSY TEHRAN

AMEMBASSY TEL AVIV

AMEMBASSY ISLAMABAD

AMEMBASSY DACCA

AMEMBASSY DAMASCUS

AMEMBASSY KABUL

AMEMBASSY NEW DELHI

UNCLAS STATE 081112

FOL RPT STATE 081112 SEBT ACTION ABU DHABI DTD 29 MAR 78

QUOTE: UNCLAS STATE 081112

E.O. 11652: N/A

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UNQUOTE COOPER

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Message Attributes

Automatic Decaptioning: X
Capture Date: 01 jan 1994
Channel Indicators: n/a
Current Classification: UNCLASSIFIED
Concepts: DEVELOPMENT BANKS
Control Number: n/a
Copy: SINGLE
Draft Date: 29 mar 1978
Decaption Date: 01 jan 1960
Decaption Note:
Disposition Action: n/a
Disposition Approved on Date:
Disposition Case Number: n/a
Disposition Comment:
Disposition Date: 01 jan 1960
Disposition Event:
Disposition History: n/a
Disposition Reason:
Disposition Remarks:
Document Number: 1978STATE081112
Document Source: CORE
Document Unique ID: 00
Drafter: OS:SHANNES:LG
Enclosure: n/a
Executive Order: N/A
Errors: N/A
Expiration:
Film Number: D780137-0336
Format: TEL
From: STATE
Handling Restrictions: n/a
Image Path:
ISecure: 1
Legacy Key: link1978/newtext/t19780311/aaaaajkz.tel
Line Count: 114
Litigation Code IDs:
Litigation Codes:
Litigation History:
Locator: TEXT ON-LINE, ON MICROFILM
Message ID: bf9b24b9-c288-dd11-92da-001cc4696bcc
Office: ORIGIN TRSE
Original Classification: UNCLASSIFIED
Original Handling Restrictions: n/a
Original Previous Classification: n/a
Original Previous Handling Restrictions: n/a
Page Count: 3
Previous Channel Indicators: n/a
Previous Classification: n/a
Previous Handling Restrictions: n/a
Reference: 78 ABU DHABI 581
Retention: 0
Review Action: RELEASED, APPROVED
Review Content Flags:
Review Date: 29 mar 2005
Review Event:
Review Exemptions: n/a
Review Media Identifier:
Review Release Date: N/A
Review Release Event: n/a
Review Transfer Date:
Review Withdrawn Fields: n/a
SAS ID: 3128328
Secure: OPEN
Status: NATIVE
Subject: ARAB MONETARY FUND
TAGS: EFIN, ARAB MONETARY FUND
To: ABU DHABI
Type: TE
vdkgvwkey: odb://SAS/SAS.dbo.SAS_Docs/bf9b24b9-c288-dd11-92da-001cc4696bcc
Review Markings:
Sheryl P. Walter
Declassified/Released
US Department of State
EO Systematic Review
20 Mar 2014
Markings: Sheryl P. Walter Declassified/Released US Department of State EO Systematic Review 20 Mar 2014